



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF WATER RESOURCES
Memphis Environmental Field Office
8383 Wolf Lake Drive
Bartlett, TN 38133
Phone 901-371-3000 Statewide 1-888-891-8332 Fax 901-371-3170

CERTIFIED MAIL: 91 7108 2133 3932 2020 7285
RETURN RECEIPT REQUESTED

February 23, 2017

Honorable Rhea Taylor
Mayor, Fayette County
P.O. Box 218
Somerville, TN 38068

RE: Notice of Violation
 Compliance Evaluation Inspection
 Arlington Mobile Home Park Wastewater Lagoon
 NPDES Tracking Number: TN0081027
 Arlington, Fayette County, Tennessee

Dear Mayor Taylor:

On Thursday, January 11, 2017, Mr. Eddy Bouzeid with the Division of Water Resources, Memphis Environmental Field Office (DWR/MEFO) conducted a Compliance Evaluation Inspection (CEI) of the wastewater treatment lagoon at the Arlington Mobile Home Park in Arlington, Fayette County. Upon arrival at the facility, Mr. Bouzeid met with Mr. Harvey Ellis, Town of Oakland/Arlington Mobile Home Park certified operator, and Mr. Bob Conrad, Mid-South Engineering Consultants, LLC, and Fayette County consultant, and stated that the purpose of the inspection was to evaluate the treatment system's compliance with its National Pollutant Discharge Elimination System (NPDES) permit. This was accomplished by reviewing the treatment system's monitoring records and discussed its self-monitoring program. Afterwards, Mr. Bouzeid, Mr. Ellis and Mr. Conrad inspected the treatment system. A copy of the Compliance Evaluation Inspection report and associated photo document is enclosed for your reference.

The wastewater treatment lagoon had numerous exceedances (678 exceedances) of its NPDES permit limits for the period from January 2014 through December 2016. In an effort to bring the treatment facility into compliance, below is a timeline of events that have occurred since April 2013:

- In April 2013, a Compliance Review Meeting was held in the MEFO with Fayette County officials and a City of Oakland representative to discuss the status of the wastewater treatment system. At that time, it appeared that the lagoon was at or near full capacity and could not assimilate further loadings. Consequently, the County hired Mid-

South Engineering Consultants, LLC, to construct a proposal on improving and upgrading the lagoon to bring it back into compliance with its NPDES permit. The improvement was contingent upon the County acquiring a Community Development Block Grant (CDBG).

- In September 2013, the County's engineering consultant met with DWR officials in Nashville to discuss the proposal to improve the treatment system.
- On February 28, 2014, the DWR Nashville Central Office approved the improvement plan that consisted of installing a fixed film modular treatment plant to the end of the wastewater lagoon. The addition includes dual Ecopod System tanks with Norweco LF2000 chlorinator and dechlorinator contact chambers. However, the approved plan expired February 28, 2015, one year after the stamped date.
- In September 2015, Fayette County received the CDBG to improve and upgrade the Arlington Mobile Home Park wastewater lagoon.
- In the spring of 2016, Fayette County's consultant engineer resubmitted the approved plan the DWR Nashville Central Office to extend the expiration date.
- On June 27, 2016, the DWR reapproved the plan and provided a new expiration date of June 27, 2017.
- In December 2016, improvement of the lagoon levee began and the upgrade of the wastewater lagoon commenced in January 2017. According to Mr. Conrad, the project should be completed in the spring of 2017.

In addition to the numerous permit limit exceedances, the following issues were noted during the inspection:

- A sign was not in place at the point of discharge at the time of the inspection. Mr. Bouzeid informed Mr. Ellis and Mr. Conrad that a sign needs to be ordered and placed at the outfall as required by the permit. The sign's specifications and the information on the sign are noted in Part III, Section B of the facility's NPDES permit. This permit deficiency was also noted in September 2013 inspection report. Mr. Ellis informed Mr. Bouzeid that a sign would be ordered and placed at the discharge point.

Required Actions:

- The Division would like to receive updates regarding the progress of the treatment system's improvement and upgrades. Therefore, please submit to the Division monthly updates to be submitted by the 15th of the month after the previous month.
- On or before March 31, 2017, please submit a written response regarding the issues noted above and steps that have been or will be taken to remedy the issues and prevent their recurrence. Please include in the written response photographic evidence that the sign required to be installed at the outfall has in fact been installed.

As a reminder, the current permit for Arlington Mobile Home Park expires on September 30, 2017. Mr. Bouzeid reminded Mr. Ellis that the current NPDES expires in approximately eight (8) months and the Division strongly recommends that the permit renewal application be submitted 180 days prior to permit expiration, which would be April 1, 2017.

The Division appreciates Mr. Ellis' and Mr. Conrad's time and assistance during the inspection. If there are factors regarding this matter that need further discussion, please contact Mr. Eddy Bouzeid 901-371-3023 or at eddy.bouzeid@tn.gov.

Sincerely,



Joelyn Brazile, CPESC
Environmental Program Manager
Division of Water Resources
Memphis Environmental Field Office

cc: TDEC/DWR/NCO - Enforcement & Compliance Section

ec: Bob Conrad – Mid-South Engineering Consultants, LLC
Harvey Ellis – Town of Oakland



TDEC - Division of Water Resources
Memphis Field Office

ICIS NPDES Facilities Inspection Report

Facility Data

NPDES ID:	TN0081027	Facility Site Name	Arlington Mobile Home Park		
		Address	Mellon Road, Fayette County		
Permit Eff. Date:	Nov 1, 2012	Permit Exp Date:	Sep 30, 2017	SIC Code:	

Compliance Monitoring Information

Compliance Monitoring Activity Name	Compliance Evaluation (non-sampling) (CEI)				
	* If Bio Monitoring is selected above, select the method used:				
Compliance Monitoring Activity	Evaluation				

Compliance Monitoring Dates/Times

Entry Date/Time (mm/dd/yyyy hh:mm):	1/11/2017 10:00	Exit Date/Time (mm/dd/yyyy hh:mm):	1/11/2017 13:00
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Facility Representatives

Harvey Ellis/(901) 508-2874 / Certified Operator	Rhea Taylor, (901) 465-5202 / County Mayor
On-Site Representative(s) Title, Phone Number	Responsible Official(s), Title, Phone Number

Statute and Section Information

Federal Statute:	CWA - Clean Water Act	State Statute:	Tennessee Water Quality Control Act	
Programs:	NPDES- Base Program (Limits, Reporting, & Schedule)			
Compliance Monitoring Reason:	Core Program			
Compliance Monitoring Agency Type:	State	Agency Name:	TDEC - DWR	
Did EPA assist/ Inspection?	No	Time Physically conducting activity:	Days: 1	Hours:
Inspection Type:	State	Compliance Monitoring Action Outcome:		
Lead Agency:	State	Compliance Monitoring Rating Code:	Unrated	
If Joint Inspection, what was the purpose of the other party?				

Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self - Compliance Program	<input type="checkbox"/> Pretreatment
<input checked="" type="checkbox"/> Records / Records	<input checked="" type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water
<input checked="" type="checkbox"/> Effluent / Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow
<input checked="" type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling / Disposal	<input type="checkbox"/> Sanitary Sewer Overflow

Compliance Monitoring Summary

See attached inspection report and/or letter.

EPA and State Representatives

	TDEC/DWR/MEFO (901) 371-3023	Feb 23, 2017
Inspector's Signature	Agency / Office / Phone	Date
	TDEC/DWR/MEFO (901) 371-3025	Feb 23, 2017
Manager's Signature	Agency / Office / Phone	Date

(Note: This form can only be printed to an XPS document, then saved for later use.)

TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION

Division of Water Resources

Memphis Environmental Field Office, 8383 Wolf Lake Drive, Bartlett, TN 38133

1-888-891-8332 (TDEC)

Compliance Inspection for Individual NPDES Permit

Facility Name: Arlington Mobile Home Park	NPDES Tracking Number: TN0081027
Permit Effective Date: November 1, 2012	Permit Expiration Date: September 30, 2017
Date and Time of Inspection: 1/11/2017	Inspector Name: Eddy Bouzeid

Official Contact Person Name: Rhea Taylor, Fayette County Mayor	
Address: P.O. Box 218, Somerville, TN 38068	Phone Number: (901) 465-5202
	Email: rtaylor@fayettetn.us

Summary of Findings and Comments

On Thursday, January 11, 2017, Mr. Eddy Bouzeid with the Division of Water Resources, Memphis Environmental Field Office (DWR/MEFO), conducted a Compliance Evaluation Inspection (CEI) at the Arlington Mobile Home Park wastewater lagoon located in Arlington, Fayette County, Tennessee.

Upon arrival at the plant, Mr. Bouzeid met with Mr. Harvey Ellis, Town of Oakland/Arlington Mobile Home Park certified operator, and Mr. Bob Conrad, Mid-South Engineering Consultants, LLC, and Fayette County consultant, and reviewed the facility's monitoring records and discussed its self-monitoring program. Afterwards, Mr. Bouzeid, Mr. Ellis, and Mr. Conrad inspected the treatment facility. The following is a summary of the findings and observations:

I. Permit

The NPDES permit for the Arlington Mobile Home Park with tracking number TN0081027 expires on September 30, 2017. A copy of the NPDES permit was available for review. A copy of the permit is kept at Mr. Ellis's office. Mr. Bouzeid reminded Mr. Ellis that the current NPDES expires in approximately eight (8) months and the Division strongly recommends that the permit renewal application be submitted 180 days prior to permit expiration, which would be April 1, 2017.

The NPDES permit authorizes the discharge of treated wastewater effluent into an unnamed tributary at mile 0.5 to Weber Branch at mile 3.0.

The design capacity of the treatment system is 0.02 Million Gallons per Day (MGD). From January 2014 through December 2016, the average effluent flow from the treatment system was 0.004 MGD and the maximum flow was 0.08 MGD, recorded in March 2015.

The Arlington Mobile Home Lagoon discharge effluent characteristic and monitoring requirements are as follows:

- CBOD – twice per month grab
- Total Suspended Solids (TSS) – twice per month grab
- Ammonia, as N - twice per month grab
- E. Coli – twice per month grab
- Settleable Solids – twice per month grab
- Dissolved Oxygen – five per week grab
- pH – twice per week grab
- Chlorine, Total Residual (TRC) – five per week grab
- Flow – five per week

II. Records/Reports

Site records and reports for the treatment system were observed and appeared to be maintained as required by the NPDES permit. Sampling and analytical data, including flow records, and Monthly Operation Reports (MORs) for the period from January 2014 through December 2016 were reviewed and appeared to be complete. Mr. Ellis signed the MORs for that period.

III. Facility Site Review

The Arlington Mobile Home Park treatment facility consists of a facultative lagoon of approximately one acre (photo 1). The effluent is chlorinated then dechlorinated before discharge (photos 1 & 2). According to Mr. Conrad, twenty two (22) homes are connected to the lagoon.

The Arlington Mobile Home Park treatment system had numerous exceedances (678 exceedances) of its NPDES permit limits for the period from January 2014 through December 2016. The exceedances were broken down as follow:

- January 2014: twenty five exceedances (25): two ammonia nitrogen, one pH, two E. Coli and twenty TRC.
- February 2014: twenty three exceedances (23): two ammonia nitrogen, one DO, two E. Coli and eighteen TRC.
- March 2014: thirty two exceedances (32): two ammonia nitrogen, nine DO, two E. Coli and nineteen TRC.
- April 2014: twenty seven exceedances (27): one ammonia nitrogen, one CBOD, two DO, one E. Coli and twenty two TRC.
- May 2014: nineteen exceedances (19): two ammonia nitrogen, five DO, two E. Coli and ten TRC.
- June 2014: twenty five exceedances (25): two TSS, two DO, one E. Coli, five pH and fifteen TRC.

- July 2014: twenty seven exceedances (27): six DO, one E. Coli, three pH and seventeen TRC.
- September 2014: twenty exceedances (20): two CBOD, one ammonia nitrogen, three DO, two E. Coli and twelve TRC.
- October 2014: twenty four exceedances (24): one CBOD, two ammonia nitrogen, one DO, two E. Coli and eighteen TRC.
- November 2014: seventeen exceedances (17): one CBOD, two ammonia nitrogen, two E. Coli and twelve TRC.
- December 2014: twenty three exceedances (23): two ammonia nitrogen, two E. Coli and nineteen TRC.
- January 2015: twenty four exceedances (24): two ammonia nitrogen, two E. Coli and twenty TRC.
- February 2015: eighteen exceedances (18): two ammonia nitrogen, four DO, one E. Coli and eleven TRC.
- March 2015: twenty three exceedances (23): two ammonia nitrogen, one DO, two E. Coli and eighteen TRC.
- April 2015: twenty seven (27): five pH and twenty two TRC.
- May 2015: twenty exceedances (20): one ammonia nitrogen, two DO, one E. Coli and sixteen TRC.
- June 2015: twenty four exceedances (24): two ammonia nitrogen, nine DO, two TSS, one pH and ten TRC.
- July 2015: twenty one exceedances (21): two ammonia nitrogen, seven DO, one pH and eleven TRC.
- August 2015: seventeen exceedances (17): one ammonia nitrogen, six DO, two pH and eight TRC.
- September 2015: ten exceedances (10): two TSS, three DO and five TRC.
- October 2015: ten exceedances (10): one ammonia nitrogen, five DO and four TRC.
- November 2015: twenty two exceedances (22): two ammonia nitrogen, five DO, one TSS and fourteen TRC.
- December 2015: fifteen exceedances (15): two ammonia nitrogen, two DO, one E. Coli and ten TRC.
- January 2016: nineteen exceedances (19): two ammonia nitrogen, one TSS and sixteen TRC.
- February 2016: eighteen exceedances (18): two ammonia nitrogen and sixteen TRC.
- March 2016: twenty eight exceedances (28): two ammonia nitrogen, four DO and twenty two TRC.
- April 2016: twenty five exceedances (25): two ammonia nitrogen, one DO, one pH and twenty one TRC.
- May 2016: twenty one exceedances (21): four pH and seventeen TRC.
- June 2016: six exceedances (6): one ammonia nitrogen, one pH and four TRC.
- July 2016: twenty three exceedances (23): one pH and no data were submitted for TRC.
- August 2016: nine exceedances (9): one ammonia nitrogen and eight TRC.

- November 2016: twelve exceedances (12): one CBOD, two TSS, one E. Coli and eight TRC.
- December 2016: twenty four exceedances (24): one TSS, two DO, one E. Coli and twenty TRC.

In an effort to bring the treatment facility into compliance, below is a timeline of events that have occurred since April 2013:

- In April 2013, a Compliance Review Meeting was held in the MEFO with Fayette County officials and a City of Oakland representative to discuss the status of the wastewater treatment system. At that time, it appeared that the lagoon was at or near full capacity and could not assimilate further loadings. Consequently, the County hired Mid-South Engineering Consultants, LLC, to construct a proposal on improving and upgrading the lagoon to bring it back into compliance with its NPDES permit. The improvement was contingent upon the County acquiring a Community Development Block Grant (CDBG).
- In September 2013, the County's engineering consultant met with DWR officials in Nashville to discuss the proposal to improve the treatment system.
- On February 28, 2014, the DWR Nashville Central Office approved the improvement plan that consisted of installing a fixed film modular treatment plant to the end of the wastewater lagoon. The addition includes dual Ecopod System tanks with Norweco LF2000 chlorinator and dechlorinator contact chambers. However, the approved plan expired February 28, 2015, one year after the stamped date.
- In September 2015, Fayette County received the CDBG to improve and upgrade the Arlington Mobile Home Park wastewater lagoon.
- In the spring of 2016, Fayette County's consultant engineer resubmitted the approved plan the DWR Nashville Central Office to extend the expiration date.
- On June 27, 2016, the DWR reapproved the plan and provided a new expiration date of June 27, 2017.
- In December 2016, improvement of the lagoon levee began and the upgrade of the wastewater lagoon commenced in January 2017. According to Mr. Conrad, the project should be completed in the spring of 2017.

IV. Effluent/Receiving Waters

There was a discharge from the wastewater lagoon at the time of the inspection (photo 2) and the discharge was clear.

The sign was not in place at the point of discharge. Mr. Bouzeid advised Mr. Ellis and Mr. Conrad that Part III, Section B, of the permit mandates the following:

The permittee shall place and maintain a sign at each outfall. The sign(s) should be clearly visible to the public from the bank and the receiving stream. The minimum sign

size should be two feet by two feet (2' x 2') with one inch (1") letters. The sign should be made of durable material and have a white background with black letters. The sign(s) are to provide notice to the public as to the nature of the discharge and in the case of the permitted outfalls, that the discharge is regulated by the Tennessee Department of Environment and Conservation, Division of Water Resources. The following is given as an example of the minimal amount of information that must be included on the sign:

NPDES permitted domestic outfall:

TREATED DOMESTIC WASTEWATER
ARLINGTON MOBILE HOME PARK
(PERMITTEE'S PHONE NUMBER)
NATIONAL POLLUTANT DISCHARGE ELIMINATION
SYSTEM PERMIT # TN0081027
TENNESSEE DIVISION OF WATER RESOURCES
MEMPHIS ENVIRONMENTAL FIELD OFFICE
PHONE NUMBER: 1-888-891-8332

Mr. Ellis informed Mr. Bouzeid that a sign, with the all specifications noted in the permit, would be ordered and placed at the discharge point.

V. Flow Measurement

The flow is recorded via weir measurements at the Outfall.

VI. Self-Compliance Program

According to Mr. Ellis, Town of Oakland personnel collect the grab samples as required by the permit. All analytical work is conducted at the Oakland Sewage Treatment Plant (STP) in Oakland. The samples are placed in a cooler with ice and delivered immediately after collection to the Oakland STP laboratory for analysis.

Dissolved oxygen (DO), chlorine residual and pH are field parameters that Oakland personnel measure at the time of sample collection. A Standard Operating Procedure (SOP) for sample collection and field equipment calibration was available for review.

VII. Compliance Schedule

Section E of the NPDES permit mandates that the Arlington Mobile Home Park treatment system install equipment as necessary to comply with the Total Chlorine Residual limit of 0.02 mg/l as a daily maximum. The upgrade of the treatment system should address this compliance requirement.

VIII. Laboratory

All analytical work is being conducted at the Oakland STP laboratory, in Oakland. An SOP for laboratory analysis of samples was available for review.

The calibration logs for the pH and DO meters were inspected and the calibrations were properly documented. Three buffers (4, 7 and 10) are utilized in the calibration of the pH meter.

IX. Operations and Maintenance

At the time of the inspection, the treatment system was being improved and upgraded to comply with its NPDES permit.

Photographic Log

Facility Name: Arlington Mobile Home Park		Site Location: Arlington, Fayette County	Tracking No.: TN0081027
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Photo No. 1	Date 1-11-2017	<div style="border: 1px solid black; padding: 5px;"> Description View of wastewater treatment system. The effluent is chlorinated then dechlorinated before discharge. The chlorination tube is placed inside the concrete structure. </div>
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Photo No. 2	Date 1-11-2017	<div style="border: 1px solid black; padding: 5px;"> Description View of the discharge point. The effluent is chlorinated then dechlorinated before discharge. The dechlorination tube is placed in the outfall structure. The discharge was clear at the time of the inspection. </div>
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